



U.S. Department of Justice

United States Attorney
Southern District of New York

United States District Courthouse
300 Quarropas Street
White Plains, New York 10601

August 30, 2021

BY ECF

The Honorable Philip M. Halpern
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: *United States v. Isaiah Santos, S3 20 Cr. 626 (PMH)*

Dear Judge Halpern:

The Government respectfully writes in response to the Court's Order regarding defendant Isaiah Santos's request for a new lawyer. The Government takes no position regarding Mr. Santos's request for a new lawyer, but sets out relevant background for the Court's consideration.

The defendant initially had Jesse M. Siegel, Esq. appointed from the Criminal Justice Act ("CJA") panel on the day of his arrest (December 1, 2020). Mr. Siegel was relieved shortly afterwards when the defendant decided to retain Mehdi Essmidi, Esq. On March 1, 2021, Mr. Essmidi was relieved as counsel after Mr. Essmidi filed a motion to be relieved despite several attempts, on his part, to "reform the relationship." (ECF. No. 130). John Burke, Esq., the defendant's current counsel, was appointed that same day.

Since Mr. Burke's appointment, the Government has had several conversations with Mr. Burke regarding (1) the discovery, and (2) a potential disposition. From conversations with Mr. Burke, it appears that he had a number of substantive conversations with the defendant regarding both topics. On or about August 10, 2021—after protracted negotiation—the Government sent Mr. Burke a formal written plea offer.

The Government is available at the Court's convenience should the Court wish to hold a hearing on this matter.

Respectfully submitted,

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cc: All Counsel (via ECF)